

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

|                           |   |                              |
|---------------------------|---|------------------------------|
| UNITED STATES OF AMERICA, | ) | CASE NO. 8:21CR193           |
|                           | ) |                              |
| Plaintiff,                | ) |                              |
|                           | ) | <b>DEFENDANT'S UNOPPOSED</b> |
| v.                        | ) | <b>MOTION TO CONTINUE</b>    |
|                           | ) | <b>DEADLINE FOR FILING</b>   |
| JAMAL D. HOLDMAN,         | ) | <b>PRETRIAL MOTIONS</b>      |
|                           | ) |                              |
| Defendant.                | ) |                              |
|                           | ) |                              |

Defendant, Jamal Holdman, by and through Assistant Federal Public Defender Michael J. Hansen, hereby moves the Court to continue the September 15, 2021, deadline for filing pretrial motions for a period of 30 days. In furtherance of said Motion, and as good cause for granting the same, Defendant shows to the Court as follows:

1. Counsel needs additional time to be review discovery with Defendant before deciding whether to file pretrial motions. Due to the current situation, that interaction is presently unable to occur in a meaningful way.

2. Counsel has informed the Defendant of his right to a speedy trial in this case. Understanding that right, the Defendant agrees that this motion is in his best interests and waives any right to a speedy trial.

3. Assistant United States Attorney Christopher Ferretti has no objection to continuing Defendant's deadline for filing pretrial motions.

WHEREFORE, Defendant respectfully requests an extension of the deadline to file pretrial motions for a period of 30 days.

DATED this 15<sup>th</sup> day of September, 2021.

JAMAL D. HOLDMAN, Defendant,

By: s/ Michael J. Hansen

**MICHAEL J. HANSEN**

**Assistant Federal Public Defender**

222 South 15th Street, Suite 300N

Omaha, NE 68102

(402) 221-7896

fax: (402) 221-7884

e-mail: mike\_hansen@fd.org